

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**IN RE PUDA COAL SECURITIES INC.
ET AL. LITIGATION**

Case No: 1:11-CV-2598 (DLC)

CLASS ACTION

**PLAINTIFFS' NOTICE OF MOTION FOR PRELIMINARY APPROVAL OF
PROPOSED CLASS-ACTION SETTLEMENT WITH MOORE STEPHENS, P.C.**

Lead Plaintiffs Salomon Querub, Howard Pritchard, and Hotel Ventures LLC, and named plaintiffs Trellus Management Company LLC and Steven Weissmann (“Plaintiffs”) hereby move this Court for entry of an Order: (a) preliminarily approving the proposed settlement with Defendant Moore Stephens, P.C. (“MSPC”); (b) provisionally certifying a Settlement Class; (c) approving the form and method for giving notice to Class Members as provided in the Stipulation and Agreement of Settlement dated September 16, 2016 (the “MSPC Stipulation”); and (d) scheduling a final approval hearing for a date at the Court’s convenience. Defendant MSPC does not oppose the relief requested by this motion.

This motion is based on this Notice of Motion, the MSPC Stipulation, the supporting Memorandum of Points and Authorities, the [Proposed] Order submitted concurrently herewith, and all pleadings, records and papers on file herein.

Dated: September 16, 2016

Respectfully submitted,

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